

Message

From: Abreu, Lilian [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E3C6E41B592441889F4E717681ACE3FB-ABREU, LILI]
Sent: 4/15/2022 4:55:02 PM
To: J. Wesley Hawthorne [hawthornej@locustec.com]
CC: Nancy-Jeanne LeFevre [LeFevren@locustec.com]; Barker, Shau-Luen [ShauLuen.Barker@philips.com]; Woo, Cynthia [cynthia.woo@aptim.com]; Poalinelli, Edwin [POALINELLI.EDWIN@EPA.GOV]; Schulman, Michael [Schulman.Michael@epa.gov]
Subject: RE: RES234/235/236 BSER Mitigation Plan, Triple Site OOU CAN000900265
Attachments: 2022-03-16 EPA Comments RES234.235.236 BSER.pdf; 2022-03-31 RES234-236 BSER - Mitigation in Progress [CUI].pdf; 2022-03-31 RES234-236_Locus RTC.docx

Wes,

Locus response to EPA comments of the report RES234/235/236 BSER Mitigation Plan, Triple Site OOU CAN000900265, is satisfactory, and the report is approved.

Please note to update EPA RPM name and contact in section 1.3, and since Locus is the author of the report and EPA role is just to review and approve it, please move the EPA RPM name to the end of the list in section 1.3

Please don't hesitate to contact me if you have any questions.

Sincerely,

Lilian Abreu, MS, PhD
Environmental Engineer - Remedial Project Manager
California Site Cleanup Section I
U.S. EPA, Region 9 Superfund and Emergency Management Division
75 Hawthorne Street, San Francisco, CA 94105
Office: 415.972-3010 | abreu.lilian@epa.gov



From: J. Wesley Hawthorne <hawthornej@locustec.com>
Sent: Monday, April 11, 2022 4:17 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Abreu, Lilian <abreu.lilian@epa.gov>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: RE: RES234/235/236 BSER Mitigation Plan, Triple Site OOU CAN000900265

Hi Michael

Yes, I understand the general mitigation system was approved as part of the March 16 comments. However, the BSER itself is transmitted to the owner to initiate discussion of the mitigation system, since it documents the final EPA-approved details for the mitigation system. Without an approved BSER, we can only provide draft text and figures to the owner, and it is difficult to get the owner's consent to proceed based on draft information which (from their perspective) could be subject to change.

Once we have approval of the BSER, the coordination typically takes 1-2 months to identify a date that works for the owner, tenants, and contractors.

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President

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From: Schulman, Michael <Schulman.Michael@epa.gov>

Sent: Monday, April 11, 2022 9:21 AM

To: J. Wesley Hawthorne <hawthornej@locustec.com>

Cc: Abreu, Lilian <abreu.lilian@epa.gov>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>

Subject: RE: RES234/235/236 BSER Mitigation Plan, Triple Site OOU CAN000900265

Hi Wes,

The SMDS was approved in the March 16, 2022 comments. For context, how long will the coordination with your subcontractor take to install the SMDS once the EPA comments on the BSER are addressed?

Thank you,
Michael

From: J. Wesley Hawthorne <hawthornej@locustec.com>

Sent: Monday, April 11, 2022 08:37

To: Schulman, Michael <Schulman.Michael@epa.gov>

Cc: Abreu, Lilian <abreu.lilian@epa.gov>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>

Subject: RE: RES234/235/236 BSER Mitigation Plan, Triple Site OOU CAN000900265

Hi Michael

On the inclusion of COCs in lab reports, we have asked Eurofins if they would include COCs going forward, but they have not responded to our request. We will follow up with them again.

On the installation timeframe, that will depend on the owner and EPA. The owner is generally aware of the plan and has not indicated any intention to decline. However, they will need a copy of this BSER which is still awaiting EPA approval.

Once we send them the approved BSER, we will reach out to schedule installation. Currently, we have air purifiers placed at this residence as interim mitigation.

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From: Schulman, Michael <Schulman.Michael@epa.gov>

Sent: Friday, April 8, 2022 5:07 PM

To: J. Wesley Hawthorne <hawthornej@locustec.com>

Cc: Abreu, Lilian <abreu.lilian@epa.gov>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>

Subject: RE: RES234/235/236 BSER Mitigation Plan, Triple Site OOU CAN000900265

Hi Wes,

As an update, EPA has preliminarily reviewed the RTCs, and I have a question regarding the response to EPA Comment #13. Can you confirm if Eurofins Air Toxics includes or does not include COCs (or sample log-in checklists) in their Level 1 or 2 Work Order laboratory reports, and if they do not, will they? My question is also applicable to a prior 6/30/21 EPA General BSER Comment that: *"Appendix U includes the lab signed sample chain of custodies as they are not part of the Eurofins laboratory reports. Instead of a separate appendix for the chain of custodies, can Eurofins include the chain-of-custodies they sign in their laboratory reports in Appendix V?"* With a Locus 8/10/21 response of *"Locus will inquire if they can do as suggested, going forward, or may incorporate the COC immediately behind each lab report PDF to consolidate Appendices U and V."*

Can you also give an update on the timeframe for when the SMDS will be installed at RES234/235/236?

Thank you,
Michael

From: J. Wesley Hawthorne <hawthornej@locustec.com>

Sent: Thursday, March 31, 2022 13:46

To: Schulman, Michael <Schulman.Michael@epa.gov>

Cc: Abreu, Lilian <abreu.lilian@epa.gov>; Woo, Cynthia <cynthia.woo@aptim.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>; Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>

Subject: RE: RES234/235/236 BSER Mitigation Plan, Triple Site OOU CAN000900265

Hi Michael:

In accordance with EPA comments, a revised BSER for RES234/235/236 has been prepared. The revised report and response to comments can be downloaded here:

[2022-03-31 RES234-236 BSER - Mitigation Plan](#)

Please let us know if this revised BSER is approved. We are in the process of arranging our next field mobilization for mitigation, so it would be helpful to have this BSER finalized and transmitted to the owner soon.

Thank you,

.....

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From: Schulman, Michael <Schulman.Michael@epa.gov>

Sent: Wednesday, March 16, 2022 11:32 PM

To: J. Wesley Hawthorne <hawthornej@locustec.com>

Cc: Barker, Shau-Luen <shauluen.barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Abreu, Lilian <abreu.lilian@epa.gov>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>; Woo, Cynthia <cynthia.woo@aptim.com>

Subject: RES234/235/236 BSER Mitigation Plan, Triple Site OOU CAN000900265

Hi Wes,

EPA has reviewed Locus Technologies' subject Building-Specific Evaluation Report (BSER) dated 25 February 2022, prepared on behalf of Philips Semiconductors Inc. (PSI). EPA approves the BSER mitigation plan to install an active submembrane depressurization system (SMDS) mitigation at the 744 San Jule Court apartment building. Given the potential for vapor intrusion into the building's living spaces, EPA asks that Philips proceed with installing the SMDS mitigation as soon as possible.

With regard to the RES234/235/236 BSER, EPA has the comments attached. Please submit responses to EPA's comments and a revised BSER within **14 days**. Please feel free to call or email me to schedule a meeting if you want to go over any of EPA's comments.

Thank you,

Michael

Michael Schulman

Superfund Project Manager

U.S. EPA, Region 9

415-972-3064 (o)

From: J. Wesley Hawthorne <hawthornej@locustec.com>
Sent: Friday, February 25, 2022 17:49
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Barker, Shau-Luen <shauluen.barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Plate, Mathew <Plate.Mathew@epa.gov>; Abreu, Lilian <abreu.lilian@epa.gov>
Subject: [CUI] RES234 Mitigation Plan, Triple Site CAN000900265

Michael:

In accordance with the indoor air results at RES234, a mitigation plan has been prepared for the apartment building at 744 San Jule Court (RES234-236). The mitigation plan is a component of the Building-Specific Evaluation Report (BSER) prepared for the building in accordance with the VI Work Plan Flow Chart. Upon EPA review and approval, a cover letter will be prepared for EPA signature and the plan (the BSER) will be provided to the owner for approval.

The report can be downloaded here.

[2022-02-25 RES234-236 BSER - Mitigation Plan](#)

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From: J. Wesley Hawthorne
Sent: Thursday, January 20, 2022 4:35 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Plate, Mathew <Plate.Mathew@epa.gov>; Abreu, Lilian <abreu.lilian@epa.gov>
Subject: RE: [CUI] RES234 Notification of Indoor Air Result above Accelerated Response, Triple Site CAN000900265

Hi Michael

These apartments are approximately 1300 sf each, and these purifiers are designed to handle up to 2000 sf.

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From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Thursday, January 20, 2022 3:10 PM
To: J. Wesley Hawthorne <hawthornej@locustec.com>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Plate, Mathew <Plate.Mathew@epa.gov>; Abreu, Lilian <abreu.lilian@epa.gov>
Subject: RE: [CUI] RES234 Notification of Indoor Air Result above Accelerated Response, Triple Site CAN000900265

Hi Wes,

Thank you for the update. What is the estimated inside square footage for each apt unit (RES234, RES235, RES236) and the estimated treatment area of the C600-DLX air purifier?

Thank you again,
Michael

From: J. Wesley Hawthorne <hawthornej@locustec.com>
Sent: Wednesday, January 19, 2022 12:23 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo, Cynthia <cynthia.woo@aptim.com>
Subject: RE: [CUI] RES234 Notification of Indoor Air Result above Accelerated Response, Triple Site CAN000900265

Hi Michael:

As a follow-up on this property, the portable air purifiers were deployed at all three ground floor tenants this morning.

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From: J. Wesley Hawthorne
Sent: Monday, January 17, 2022 9:48 AM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo, Cynthia <cynthia.woo@aptim.com>
Subject: RE: [CUI] RES234 Notification of Indoor Air Result above Accelerated Response, Triple Site CAN000900265

Hi Michael:

The portable air purifiers we have used for this project are Airpura C600DLX (specifications attached). We have used these for interim mitigation at other properties in the OOU, and they have been effective at reducing VOC concentrations.

We are in the process of communicating with tenants regarding the purifiers, primarily by phone but we will cc you on any email correspondence going forward. We can update you later this week on which tenants have accepted the purifiers.

An updated figure is attached with results from both sampling events. The concentrations in black font are from the 12/16 event, and concentrations in blue are from the 1/5 event.

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From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Friday, January 14, 2022 4:42 PM
To: J. Wesley Hawthorne <hawthornej@locustec.com>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo,

Cynthia <cynthia.woo@aptim.com>

Subject: RE: [CUI] RES234 Notification of Indoor Air Result above Accelerated Response, Triple Site CAN000900265

Hi Wes,

Thank you the timely update on 744 San Jule Court, RES234.

- I agree with the implementation of the Work Plan Fig 5 flow chart you've outlined below.
- What type of air purifier will be offered, please let me know by Jan 18.
- Please let me know what tenants accepted and didn't access the air purifiers.
- Can you send me an updated field figure with the new Jan 5 results.
- Please cc: me on any correspondence with the property owner and tenants.

Thanks again,
Michael

From: J. Wesley Hawthorne <hawthornej@locustec.com>

Sent: Friday, January 14, 2022 2:27 PM

To: Schulman, Michael <Schulman.Michael@epa.gov>

Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo, Cynthia <cynthia.woo@aptim.com>

Subject: RE: [CUI] RES234 Notification of Indoor Air Result above Accelerated Response, Triple Site CAN000900265

Hi Michael

As we discussed, we will be preparing for EPA a BSER for this property that includes data evaluation as well as a mitigation plan (in accordance with the VI Work Plan Flow Chart). The BSER will ultimately be provided to the owner for review and approval. Based on the work plan, the deadline for that BSER to EPA is 25 February (45 days from determination of the need to mitigate). In accordance with the ASAO, SOW Section III.D.2., we will be implementing mitigation measures within "days to weeks". To meet that schedule, we are offering portable air purifiers to the ground-floor units as an interim measure (coordinated through the property owner and property manager). The air purifiers will remain in place while we complete the BSER preparation, obtain owner approval, and schedule the mitigation system installation. For the tenants who accept, the purifiers will be installed on January 19. Please let us know if you have any questions on this interim effort.

Thank you,

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From: Schulman, Michael <Schulman.Michael@epa.gov>

Sent: Monday, January 10, 2022 3:22 PM

To: J. Wesley Hawthorne <hawthornej@locustec.com>

Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo, Cynthia <cynthia.woo@aptim.com>

Subject: [CUI] RES234 Notification of Indoor Air Result above Accelerated Response, Triple Site CAN000900265

Hi Wes,

Thank you for the response below and the preliminary indoor air results from RES234/235/236 / 744 San Jule Court. Can you meet this Wed 1-2 or 3-4 PM or this Thursday 9:15 AM to 2 PM to go over RES234? We can also go over the status of RES226 and RES219.

Thank you,
Michael
628-629-2421 (m)

From: J. Wesley Hawthorne <hawthornej@locustec.com>

Sent: Monday, January 10, 2022 2:10 PM

To: Schulman, Michael <Schulman.Michael@epa.gov>

Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo, Cynthia <cynthia.woo@aptim.com>

Subject: RE: [CUI] Notification of Indoor Air Result above Accelerated Response Action Level, Triple Site CERCLIS ID CAN000900265

Hi Michael:

Yes, we are in the process of following the work plan flow chart on responding to this action level exceedance. Here are responses to these questions:

- Has the VI Work Plan Figure 5 flow chart been implemented: "Rush Response: Conduct more thorough inspection of potential indoor sources and pathways and collect and analyze confirmation samples with additional pathway locations if identified."

Additional building surveys were completed during the 1/5 sampling for two of the three units, as well as confirmation samples.

- Has the property owner and tenant been notified?

We are notifying the property manager and tenants this week, and are prepared to answer any questions on potential outcomes resulting from the second sampling event, including mitigation options.

- Where all 3 ground units sampled?

Yes, all 3 ground floor units have been sampled.

- When will the 2nd winter sampling event results be available?

We are accelerating the turnaround for the samples collected on 1/5, and we anticipate those results this week.

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From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Friday, January 7, 2022 6:27 PM
To: J. Wesley Hawthorne <hawthornej@locustec.com>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo, Cynthia <cynthia.woo@aptim.com>
Subject: RE: [CU] Notification of Indoor Air Result above Accelerated Response Action Level, Triple Site CERCLIS ID CAN000900265

Hi Wes,

Thank you for the notification and summary for 744 San Jule.

- 12/16/21: 1st winter sampling event, excluding crawlspace (couldn't access it)
- 1/5/22: 2nd winter sampling event, including crawlspace
- 1/7/22: 1st winter sampling pathway result of 3.8 µg/m3, indoor air results 1.0 < 1.7 ug/m3.
- (1/20 to 1/27: pending 2nd winter sampling event results)

Based on the pathway TCE Accelerated Response exceedance of 2 µg/m3, the building would warrant response within weeks.

- Has the VI Work Plan Figure 5 flow chart been implemented: "Rush Response: Conduct more thorough inspection of potential indoor sources and pathways and collect and analyze confirmation samples with additional pathway locations if identified."
- Has the property owner and tenant been notified?
- Where all 3 ground units sampled?
- When will the 2nd winter sampling event results be available?

I'll follow-up next week on what short-term response PSI/Locus proposes given the exceedance of the Accelerated Response Action Level.

Thank you,
Michael

From: J. Wesley Hawthorne <hawthornej@locustec.com>
Sent: Friday, January 7, 2022 2:58 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Woo,

Cynthia <cynthia.woo@aptim.com>

Subject: [CUI] Notification of Indoor Air Result above Accelerated Response Action Level, Triple Site CERCLIS ID CAN000900265

Michael:

In accordance with the ASAO and VI Removal Work Plan, Locus is notifying EPA of an indoor air result in exceedance of the Accelerated Response Action Level for TCE ($2 \mu\text{g}/\text{m}^3$) at the Triple Site Offsite Operable Unit. Today we received a VI pathway TCE result of $3.8 \mu\text{g}/\text{m}^3$ at 744 San Jule Court (under the kitchen sink of Unit #1, RES234-PATH-1). All ambient samples (samples in the occupiable space) are below the Action Level.

This property was sampled on 16 December 2021 after receipt of a fully executed Access Agreement with the owner. The results were received on 7 January 2022. This is the first sampling event at the property, which came in response to the November 2021 letter transmitted from EPA to the owners of candidate buildings for preemptive mitigation listed in Table 3 of the VI Removal Work Plan.

744 San Jule Court is an apartment building with three ground-floor units. TCE was not detected in the outdoor air and PCE was not detected at the building. Additionally, although cleaning products were stored under the kitchen sink of Unit #1, where the result of $3.8 \mu\text{g}/\text{m}^3$ was observed, none were found to contain TCE. The TCE sample results throughout the ground-floor of the building are shown in the attached figure. The property's location can be found in reference to the Triple Site using the latest VI status map last prepared for the 10 November 2021 VI Monthly Progress Report; it is attached for ease of reference.

A crawlspace sample was not collected during this sampling event due to the configuration of double screens on the passive vents of the crawlspace discovered the day of sampling. However, this building was re-sampled on 5 January 2022, at which time Locus also obtained a crawlspace sample by using additional materials to gain access through the screened vents while maintaining the screens' integrity and after consultation with the property manager.

Laboratory results have not yet been received from the 5 January 2022 event. Sampling on 5 January was completed to ensure two rounds of winter heating season sampling, having scheduled both rounds with the owner up-front. Locus will report back the results from the 5 January event upon receipt from the laboratory, and will then discuss next steps for this property with you.

In the meantime, please let me know if you have any questions.

.....
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